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Attorneys for Plaintiff Secretary of Labor

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

MARTIN J. WALSH,
Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

IMPERIAL PACIFIC INTERNATIONAL
HOLDINGS, LTD., and IMPERIAL PACIFIC
INTERNATIONAL (CNMI), LLC,

Defendants.

Civil Case No. 1:19-cv-00007

**ACKNOWLEDGMENT OF
SATISFACTION OF JUDGMENT**

1 WHEREAS, on April 11, 2019, the Court entered a Consent Judgment through which
2 Defendants Imperial Pacific International Holdings, Ltd. and Imperial Pacific International (CNMI),
3 LLC (collectively “IPI”) agreed, among other things, to the entry of a judgment to be paid to the
4 Plaintiff in the total amount of \$3,360,000, comprising of back wages, liquidated damages, and civil
5 monetary penalties. ECF No. 2. On March 23, 2021, the Court entered a First Amendment to
6 Consent Judgment, through which the parties agreed to a modified payment schedule under which IPI
7 would pay \$1,478,430.08—the remaining amount due under the judgment—and agreed that, as
8 security for IPI’s monetary liability of \$1,478,430.08, IPI would to record a lien in favor of Plaintiff
9 against the leasehold parcels of property commonly known as the Flame Tree Terrace. ECF No. 59.
10 On August 12, 2021, the Court entered an Amendment to Payment Plan of First Amended Consent
11 Judgment, modifying the payment plan under which IPI would make payment of the judgment, but
12 not otherwise amending the terms of the First Amended Consent Judgment, including as regards the
13 security interest in Flame Tree Terrace. ECF No. 82. The judgment amount as defined in the
14 Consent Judgment and First Amended Consent Judgment was fully paid by IPI, with the final
15 payment transmitted on February 8, 2022.
16

17 The parties hereby acknowledge that IPI has made full payment of the judgment amount
18 secured by the lien in favor of Plaintiff against the Flame Tree Terrace. Plaintiff acknowledges that
19 the lien established by the Consent Judgment, recorded on March 25, 2021 under File No. 21-0524 at
20 Commonwealth Recorder’s, Saipan, as amended by the First Amendment to Consent Judgment,
21 recorded on March 30, 2021 under File No. 21-0534 at Commonwealth Recorder’s, Saipan, will be
22 released through the recording of this Acknowledgement of Satisfaction of Judgment with the
23 Commonwealth Recorder’s, Saipan.
24
25

1 THEREFORE, full and complete satisfaction of said monetary judgment is hereby
2 acknowledged, and the Clerk of the Court is hereby authorized and directed to make an entry of such
3 full and complete satisfaction on the docket of said judgment. The non-monetary provisions of the
4 judgment remain in effect.

5
6 Dated: June 27, 2022

Respectfully Submitted,

7 /s/ Charles Song

/s/ Kevin Abikoff

8 Charles Song, Senior Trial Attorney
9 Boris Orlov, Senior Trial Attorney
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